



Second Program Year
Action Plan

GENERAL

Executive Summary

The County of Kent's (herein referred to as Kent County, the County, or the Consortium) FY 2013-2014 One-Year Action Plan covers the time period from July 1, 2013 through June 30, 2014. The Annual Action Plan describes the County's activities under the Urban County Consortium and planned initiatives to meet the National Objective of benefitting low- and moderate-income persons in Kent County.

The goals of the Consortium include the following:

- Create Suitable Living Environments,
- Develop Quality Affordable Housing Opportunities, and
- Stabilize Communities through Partnerships and Target Development

These initiatives will be administered by the Kent County Community Development Department (KCCD) through contracts with non-profit service agencies and development partners. All activities will be carried out as prescribed by the U.S. Department of Housing and Urban Development (HUD) in accordance with the federal regulations. The services and development projects in the upcoming fiscal year are determined by the citizens of the 33 local units of government that make up the Kent County Consortium. All cities, townships, and villages in Kent County are currently participating in the County's CDBG program including the western half of the Village of Casnovia, which is located in Muskegon County. The cities of Grand Rapids and Wyoming are Participating Jurisdictions and therefore excluded from the County Consortium.

The County of Kent anticipates the U.S. Department of Housing and Urban Development (HUD) to grant its 2013-2014 annual entitlement as follows:

A. Community Development Block Grant (CDBG) - \$1,466,703 and

B. Home Investment Partnership (HOME) - \$674,111

Entitlement funding will be supplemented with an estimated \$45,000.00 in Program Income from the Homeowner Rehabilitation program and \$8,565.00 in allowable revenues from the prior fiscal year.

Additional Sources of Federal Funding Include:

Supportive Housing Program (SHP) - Shelter Plus Care	\$ 1,326,720
Public and Indian Housing (PIH) - Housing Choice Voucher Program	\$ 3,218,141
- Family Self-Sufficiency Program	<u>\$ 117,082</u>
Federal Total:	\$ 4,661,943

Non-federal Resources Include:

Home Investment Partnership (HOME) – Match (@ 25%)	\$ 168,527
Kent County Funds Leveraged through CDBG Program	\$ 200,000
Locally Leveraged Funds through CDBG Program	\$ 140,000
Supportive Housing Program (SHP) - Shelter Plus Care Match (@100%)	<u>\$1,326,720</u>
Non-Federal Total:	\$1,835,247

The total for all sources of federal and non-federal funds including CDBG and HOME projected program income is eight million, five hundred ninety five thousand, seven hundred eighty four dollars (\$8,691,569.00).

The priorities and specific annual objectives addressed during the 2013-2014 program year are consistent with those identified in the Five Year Consolidated Plan which include:

1. To eliminate conditions that are detrimental to health safety and public welfare through housing rehabilitation and assistance;
2. To expand and improve the quantity and quality of public and community facilities and improvements;
3. To eliminate conditions detrimental to health, safety and public welfare through public services that benefit low- and moderate-income persons; and

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4. To remove slums and blight on a spot basis by clearance or preservation of properties with historical or architectural significance

In carrying out these priorities, for 2013-2014, CDBG and HOME funds are budgeted for both services and development projects. CDBG will fund a number of construction projects including public facilities and improvements, neighborhood facilities, parks and recreational facilities, street improvements, sidewalks and non-motorized trails. Services funding will be provided for programs that serve presumed low- and moderate-income clientele such as senior citizens, disabled persons, and teens in the categories of parenting, foreclosure prevention counseling, and transportation services. Our rehabilitation programs will include homeowner occupied housing rehab loans, minor home repairs, and accessibility modifications. KCCD administrative costs are solely provided through the grant programs. This KCCD receives no County of Kent general funds.

CDBG programs are required to meet a national objective as defined by HUD. The projects presented in this plan meet the national objective of directly benefiting low and moderate income homeowners and residents, including seniors and the disabled. Seniors and disabled are considered members of the presumed benefit clientele, and therefore automatically considered low income. All construction projects and activities meet the national objective by taking place in low/mod target areas or because participant households are income qualified. CDBG Target Areas are based on U.S. Census data and cross referenced by HUD income standards, and have a ratio of low/mod income residents of 39.82 to every 100 residents (39.82%).

B. HUD HOME Investment Partnerships Program (HOME)

HOME-funded projects will be located within the 33 Participating Communities in the Kent County Consortium with the addition of the City of Wyoming under the umbrella of the Kent County HOME Consortium.

For 2013-2014, HOME funds are budgeted for the development of affordable housing for low-moderate-income households. KCCD will contract with qualified developers to conduct the acquisition and rehabilitation of rental and for sale units.

The HOME program requires each participating jurisdiction to contribute non-federal cash or in-kind matching funds to aid in the development of affordable housing. Because Kent County does not contribute to the Community Development Department financially, we meet our match obligation through direct contributions of in-kind, cash and voluntary support given to each specific development project. Each development partner documents match as it relates to each individual address for at least 25% of the development funds expended. We are not required to match amounts expended for General Program Administration and Community Housing Development Organization (CHDO) technical support.

2013-2014 CDBG and HOME Projects Summary

The following is a list of planned activities utilizing the \$2,185,784 of CDBG and HOME funds expected to be available July 1, 2013 through June 30, 2014.

Public Facilities and Improvements	\$305,262
Public Services	\$220,005
Housing Rehabilitation	\$638,096
General Program Administration	\$303,340
Program Income	\$ 45,000
HOME INVESTMENT PARTNERSHIP PROGRAM	
Housing Programs	\$606,670
General Program Administration	\$ 67,411

General Questions Response:

Geographic Area

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The County of Kent's (herein referred to as Kent County of the Consortium) FY 2013-2014 One-Year Action Plan covers 34 cities, townships, and villages in Kent County except for the cities of Grand Rapids and Wyoming, which operate their own entitlement CDBG programs. (The western half of the Village of Casnovia, which is located in Muskegon County, is also part of the County of Kent CDBG Program's jurisdiction.)

Basis for Allocating Investment

CDBG-funded service programs will directly benefit only low- and moderate-income homeowners and residents, including seniors and the disabled. The remaining projects are geographically targeted to primarily residential areas that have a high concentration of low- and moderate-income residents. CDBG Target Areas are determined by HUD income standards, in census tracts that have 39.8% or more of their residents classified by HUD as low- or moderate-income persons. A map of the Kent County Target Areas is included as an attachment.

Meeting Underserved Need

Meeting the needs of the underserved or less advantaged members of the Kent County communities is a pressing goal. Each year increasing numbers of families who have not required any form of outside assistance to maintain their housing, buy their food, make repairs on their homes, etc., are now in need of assistance. It is our endeavor to make sure they know where to gain access to services and to be aware of the opportunities to participate in the CDBG/HOME allocation processes. Over the past year we have worked with all of the small villages and townships to make them aware of our services. For example, through the Homeowner Repair Program, we have developed an information and online application page on accesskent.com as well as links to our information in the electronic newsletters, web pages and bulletins of the Local Units of Government. We will continue to attend meetings in the sub-rural communities in our jurisdiction and publicize our programs in the impacted communities. We believe this will help us meet the underserved need; reaching out-county low- moderate-income families and individuals.

Federal State and Local Resources

Federal Funds that are expected to be used in our communities identified in the plan are as follows:

▪ McKinney Vinto – Supportive Housing – Shelter Plus Care	\$ 1,326,720
▪ Public and Indian Housing (PIH) - Housing Choice Voucher Program	\$ 3,218,141
▪ Family Self-Sufficiency Program	\$ 117,082
▪ Kent County Roads Commission -	\$ 67,222

Lead Agency

The Kent County Community Development Department is responsible for administering and managing housing and community development related grants as an integral part of Kent County's affordable and supportive housing strategy. Various County departments and agencies, in conjunction with federal, state, and local governmental and non-profit entities, as identified in the 2011 Consolidated Housing and Community Development Plan, implement strategies to resolve the lack of affordable housing and sustainable communities.

- Community Development Block Grant (CDBG)
- Kent County HOME Investment Partnerships (HOME)
- City of Wyoming HOME Investment Partnership (HOME)
- Shelter Plus Care (S+C)
- Neighborhood Stabilization Program (NSP)

The Kent County Housing Commission, which is jointly staffed and located with the Kent County Community Development Department, is responsible for managing and implementing the following housing programs and activities within Kent County:

- Housing Choice Vouchers (Section 8)
- Family Unification Program Vouchers (FUP)
- Veterans Affairs Supportive Housing Vouchers (VASH)
- Family Self-Sufficiency Program (FSS)
- Section 8 Homeownership Program (HCV)

The Rockford Housing Commission is responsible for the following programs within its jurisdiction:

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- Capital Fund Program
- Housing Choice Vouchers (Section 8)
- Family Self-Sufficiency (FSS) Program (if available)

The remaining programs identified herein are managed either by the City of Grand Rapids, Detroit HUD Field Offices, the Michigan State Housing Development Authority (MSHDA), or the Grand Rapids office of the U.S. Department of Agriculture Rural Development.

▪ Rural Development Multi-Family Housing Rental Assistance	\$493,500
▪ Rural Development Single Family Housing Direct Loans	\$695,044
▪ Michigan State Housing Development NSP	\$ 72,000

State of Michigan programs are administered in Kent County by Non-housing Community Development activities identified herein are managed and implemented by the Kent County Community Development Department.

Citizen Participation Response:

Kent County conducted a public hearing on December 9, 2011 to obtain opinions and recommendations on the housing and community development needs of the entire area. Via a notice in The Grand Rapids Press, the general public, social service agencies, housing providers, and nonprofit organizations were invited to attend the hearing. Additionally, the notice was also posted on the County's web site.

The Housing and Community Development Director for Kent County opened the public hearing at 2:00 p.m. on December 9, 2011 in the offices of the Kent County Community Development Department at 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503. There being no persons present to provide input, the public hearing was closed at 5:00 p.m.

Kent County has historically allocated a majority (58%) of its non-housing Community Development Block Grant funds to the participating communities within the county. This allocation is based on the percentage of low- and moderate-income persons residing within these jurisdictions. The needs portion of the non-housing Community Development Block Grant activities is determined through the decision-making process at the local governmental level. Kent County firmly believes that local community needs can best be determined by local decision makers.

The allocation process utilized by the Kent County Community Development Department is extremely detailed and each jurisdiction is provided with a comprehensive set of instructions and guidelines.

Public hearings on the proposed use of CDBG funds were conducted in December of 2011 and in January and February of 2013, by the local Township Boards, City Councils and Village Councils of the CDBG Program Participating Communities.

In order to assist in the planning and data gathering effort, the Kent County Community Development Department maintains official or unofficial contact with the following organizations and agencies to assist in obtaining housing needs data, defining specific programs or funding sources, identifying emergency housing needs, identifying supportive housing services, and planning for meaningful long-term housing market impact.

Kent County Emergency Needs Task Force &
Emergency Shelter Assistance Subcommittee
Kent County Community Mental Health
Kent County Health Department
Fair Housing Center of Greater Grand Rapids
Kent County Department of Human Services
Home and Building Association of Greater Grand Rapids
Grand Rapids Housing Commission
Kentwood Housing Commission
Rockford Housing Commission
Wyoming Housing Commission
Michigan State Housing Development Authority (MSHDA)
U.S. Department of Agriculture, Rural Development (USDA-RD)
U.S. Department of Housing and Urban Development (HUD)
Various local financial institutions
Various emergency housing providers

Public Review Period

The public hearing draft of the 2013-2014 Annual Action Plan element of the 2011-2014 Consolidated Plan document was made available for the 30-day public comment period on February 12, 2013. The "Notice of Public Hearing and Notice of Public Availability" was published in The Grand Rapids Press on February 12, 2013. The public hearing draft 2013-2014 Annual Action Plan element of the 2011-2014 Consolidated Plan document was made available to the public at the Kent County Community Development Department, 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503, the Grand Rapids Main Library 111 library Street, Grand Rapids MI 49503, the Krause Memorial Branch Library, 140 E. Bridge Street, Rockford, MI 49341 and www.accesskent.com.

A public hearing on the 2013-2014 Annual Action Plan element of the 2011-2014 Consolidated Plan document will be on March 13, 2013 at 4:00 p.m. in the offices of the Kent County Community Development Department at 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503.

Citizen Participation Plan

In accordance with the regulations of the U.S. Department of Housing and Urban Development (HUD) pertaining to the Community Development Block Grant (CDBG), and HOME programs and the preparation of planning documents, funding applications (and amendments thereto) and performance reports related thereto, the following procedures for obtaining citizen participation shall be adhered to by the County of Kent.

Citizens living within the Kent County CDBG Program Participating Communities are encouraged to submit their views, opinions, and proposals regarding CDBG and HOME needs, proposed uses of funds, and performance either in writing or during the course of public meetings or public hearings held by participating local units of government or at public hearings held by the County of Kent. Low and moderate income persons, particularly those living in slum and blighted areas, or who are residents of public or assisted housing developments, or who are living in areas where CDBG and HOME funds are proposed to be used or who are residents of predominantly low and moderate income neighborhoods, are encouraged to communicate their views, opinions, and proposals.

The County of Kent will provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to its CDBG and HOME planning and application documents (and any amendments thereto), along with all appropriate records (defined as those records not specified as being exempt from release under Michigan's Freedom of Information Act) pertaining to activities implemented by CDBG and HOME funding within the five-year period preceding the date of any such request for access to such records. Local and county officials will be made aware of the CDBG and HOME programs and will be available and accessible to answer questions concerning the CDBG and HOME, programs, particularly from low and moderate income persons.

Before each CDBG and HOME program year, the County of Kent shall notify all 33 of its Urban County CDBG Program Participating Communities of the annual CDBG Program's requirement to conduct a public hearing to afford interested residents and other parties opportunity to provide their views, opinions, and proposals.

These city/village/township public hearings shall be given reasonable local public notice, and shall be conducted prior to the programming of the Participating Community's allocated CDBG funds. All local decisions regarding the programming of allocated CDBG funds shall be officially adopted by the legislative body of the Participating Community, and documentation of such action shall be required in the form of meeting minutes and/or a resolution submitted to the Community Development Department.

During each CDBG and HOME program year, the County of Kent, through its Community Development Department, shall conduct three (3) public hearings to afford interested parties opportunity to provide their views, opinions, and proposals.

One of these public hearings shall focus on providing an opportunity for interested parties to provide their views and opinions on housing and community development needs, and this public hearing shall be held before the annual planning and/or application document is prepared and made available for public comment. Notice of this public hearing shall be published in The Grand Rapids Press at least fourteen (14) days prior to public hearing and posted on the County of Kent County web site.

In addition, written notification shall be mailed to public agencies and other interested parties that have either participated in previous public hearings or expressed an interest in being advised of the public hearing date. Such written notification shall be mailed to the Hispanic Center of Western Michigan, various minority-based community groups, Disability Advocates of Kent County, and to senior/community centers located in the Participating Communities of the Urban County CDBG

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Program. The County of Kent reserves the right to conduct this public hearing on a joint basis with other local CDBG and HOME entitlement grantees, for the purpose of obtaining a county-wide expression of housing and community development needs.

The second of the three (3) annual public hearings shall focus on providing a reasonable opportunity for citizens, public agencies and other interested parties to examine and submit comments pertaining to the proposed planning document and funding application. This public hearing shall be held only after a summary of the proposed planning document and funding application, along with a notice of the date, time and location of the public hearing, is published in The Grand Rapids Press. This notice shall be published at least thirty (30) days prior to the public hearing date. Copies of the proposed planning document and funding application shall be available for public inspection and review during the thirty (30) day period prior to the public hearing. A summary of the views and comments received during the review period and at the public hearing, and a summary of any views and comments not accepted and the reasons therefore, shall be prepared by the County of Kent and attached to the final planning document and funding application submitted to HUD.

The third of the three (3) annual public hearings shall focus on providing a reasonable opportunity for citizens, public agencies and other interested parties to review and comment upon CDBG and HOME program performance. Notice of this public hearing, including notice of the availability of the proposed performance report and the date, time and location of this public hearing shall be published in The Grand Rapids Press and posted on the County of Kent web site.

This notice shall be published at least fifteen (15) days prior to the public hearing date. Copies of the proposed performance report shall be available for public inspection and review during the fifteen (15) day period prior to the public hearing. A summary of the views and comments received during the review period and at the public hearing shall be prepared by the County of Kent and attached to the final performance report submitted to HUD.

In addition to the above three (3) public hearings, the County of Kent will hold a public hearing prior to the submission of any substantial amendments to its HUD-approved planning document/funding application. The requirements for any such public hearing shall parallel the requirements specified above for the second of the three (3) annual public hearings, as set forth above. A substantial amendment to a HUD-approved planning document/funding application is required when an activity is proposed to be undertaken during the course of a program year and that activity is not included in the HUD-approved planning document/funding application AND the cost of that proposed new activity exceeds ten percent (10%) of the annual CDBG or HOME entitlement grant for the subject program year.

All public hearings shall be held at locations convenient to potential and actual CDBG and HOME program beneficiaries, in buildings and rooms accessible to persons with disabilities. Consistent with county policy and practice, all public hearings shall be held on a weekday afternoon. Provisions of Michigan's Open Meetings Act shall apply. In the event a proposed project or activity will apparently impact a significant number of non-English speaking persons, bi-lingual opportunities will be provided at the public hearings through the use of local resource persons. Decision-making may be delayed when a significant portion of the public hearing participants do not speak English.

Technical assistance will be provided to groups representative of persons of low and moderate income that request such assistance in developing proposals for funding assistance under any program included in the planning document/funding application.

Complaints received from citizens related to the planning document/funding application, amendments thereto, performance reports, and CDBG and HOME funded program activities will be addressed in a timely manner. In the case of written complaints, the County of Kent will provide a written response within fifteen (15) working days, where practicable.

It is the intent of this Citizen Participation Plan to encourage citizens, public agencies and other interested parties to become better informed of and to participate in the process of planning and implementing activities funded by Federal agencies that impact their homes, neighborhoods and communities. Views, comments, opinions and complaints are to be welcomed as forms of improved communication. It must be clear, however, that the County of Kent, by contractual obligation, cannot allow citizen participation activities to restrict its responsibility or authority for the development and execution of its Federally-assisted programs.

All phases of the process will be conducted by in an open manner. Citizens are encouraged to participate at all levels and will be given access to program information during each phase of the programs as outlined herein.

Technical Assistance

The staff of the County of Kent Community Development Department shall provide technical assistance to individual citizens and citizen groups, with particular attention to those groups representative of persons of low or moderate income, as

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may be required to adequately provide for citizen participation in the planning, implementation and assessment of CDBG and HOME programs.

Such technical assistance is intended to further meaningful citizen participation in the community development decision making process. Technical assistance will also be utilized to foster public understanding of CDBG and HOME program requirements.

Technical assistance will be provided on request and may include, but not necessarily be limited to: interpretation of the CDBG and HOME programs and its rules, regulations, procedures and other requirements; providing information and/or materials concerning the programs; and, assisting low and moderate income citizen, and low/mod income communities develop statements of views, identify their needs, and to develop activities and proposals for projects which when implemented, will advance the resolution of those needs. Technical assistance may be obtained by contacting the Community Development Department at 616-632-7400.

Any citizen, public agency or other interested party that desires further information on this Citizen Participation Plan, or who wishes to express a view, comment, opinion or complaint on a Federally-assisted activity under a planning document, funding application or agreement or grant agreement subject to this Citizen Participation Plan, is invited to contact Linda S. Likely, Director of Housing and Community Development for the County of Kent, at 82 Ionia Avenue NW, Suite 390, Grand Rapids, MI 49503, (616) 632-7404.

Institutional Structure Response:

The Grand Rapids metropolitan area fortunately continues to have a highly committed non-profit community devoted to the housing and social service needs of low income persons and families. The private sector has also proven to be quite responsive to the housing and social needs of the area's residents, particularly the churches, local foundations, and professional associations. The greatest response from these groups has been in the area of homelessness. While most groups work primarily in the city of Grand Rapids, several have focused on out-county housing issues and concerns. The homeless advocacy groups serve residents throughout Kent County.

Kent County will continue to work to improve the institutional structure during the 2013-2014 program year in a number of important areas, including internal capacity building in the area of HOME Program administration, outreach to CHDOs, certification of CHDOs for Kent County HOME Program participation and utilization of the Kent County Land Bank as appropriate.

Action Plan Monitoring Response:

In order to monitor housing and community development projects and ensure compliance with program requirements, each subrecipient and developer contract establishes the parameters and timelines expected in the CDBG and HOME program. Developers have a clear timeline for submission of invoices and delivery of housing units. Local Units of Government and nonprofits have clearly delineated expectations and are required to enter into contracts for specific projects with timelines for completion. Most contracts have a one year timeframe or less and include language relative to the debarred list and conflict of interest.

Kent County has established a monitoring system for its Community Development Block Grant and HOME programs, which it uses to monitor all subrecipients of CDBG and HOME assistance provided throughout Kent County.

Subrecipients of CDBG funding are required to submit regular reports on both financial and program activities status. The Community Development Manager maintains communication with subrecipients on a regular basis to facilitate project timeliness. Additionally, an annual on-site monitoring of the subrecipient's program is conducted. Finally, Kent County requires an independent (CPA) financial audit of any agency under contract.

When housing rehabilitation is involved, the following standards are applied:

1. Housing Inspection Manual (24 CFR 882.109), for Housing Quality Standards or for local building code, whichever is higher.
2. Lead-Based Paint Hazard Elimination (24 CFR Part 35).

In addition, the following additional standards are utilized:

1. CABO Model Energy Code (1994); or
2. Michigan Energy Code

3. Housing Regulations for Kent County

In addition to these general monitoring guidelines, any other items that are deemed necessary for proper monitoring of subrecipients are utilized on an as-needed basis.

As the lead agency in the HOME program, Kent County Community Development Department assumes lead responsibility for ensuring compliance of all HOME program activities. To that end, the following are monitoring activities and responsibilities of the Community Development Department as the lead agency.

For any HOME activity, compliance review can occur at up to four stages in the process:

1. At time of project selection and approval: The applicable subrecipient/subgrantee is responsible for assembling all required information and submitting it to the Community Development Department, subsequent to commitment of funds;
2. During implementation, construction and disbursement: In addition to routine Kent County HOME program monitoring of HOME-funded projects, the applicable subrecipient/subgrantee is responsible for monitoring implementation of the project, including construction monitoring, and for certifying and documenting compliance;
3. Upon project completion: Recapture of HOME funds under the Kent County HOME Program guidelines may be required (refer to the HOME Program narrative section in the Kent County Annual Action Plan); and
4. If rental units are assisted, ongoing compliance monitoring will occur annually in compliance with the requirements at 24 CFR 92.252 and 92.504(d) for on-site inspections.

All HOME compliance issues will be reviewed at one or more of these stages.

The Community Development Department monitors its own performance in meeting goals and objectives set forth in the Consolidated Plan through the annual audit process.

Lead-based Paint Response:

Number of Housing Units with Lead-Based Paint Hazards

Each year the American Communities Survey conducts a national survey conducted which helps HUD established estimates for the percentage of houses containing lead-based paint, based on the year of construction. Utilizing these percentages from the 2010 ACS, we estimate that 127,021 out of the 227,177 occupied houses in Kent County, excluding Grand Rapids and Wyoming were built before 1978. This means 55% of the occupied housing units are a potential risk for lead-based paint hazards.

Understanding the Problem

On May 16, 2013 the US Center for Disease Control and Prevention lowered the level of concern for childhood lead poisoning. This change, according to the Healthy Homes Coalition of West Michigan, will mean a greater focus of action on those children with the highest blood lead levels. Respectively, in 2011 Kent County had 68 children birth through age five identified as having elevated blood lead levels above 10.0 ug/dL, and 727 children had lead levels above 5.0ug/dL.

Addressing the Need

In order to address the most common sources of childhood exposure to lead which are deteriorated lead-based paint and lead-contaminated dust and soil, Kent County will continue to partner with the “Get the Lead Out!” Home Repair program offered through the City of Grand Rapids in partnership with the Kent County Health Department. In addition, Kent County adheres to the environmental review policies established under NEPA on all development projects, including Homeowner Rehabilitation, Minor Home Repair, HOME Investment Partnerships, etc. Properties rehabilitated with CDBG/HOME funds are required to undergo lead testing and abatement when rehabilitation thresholds are met or lead testing indicates contamination. We will continue to require environmental reviews of our projects, with particular concern towards units constructed before 1978.

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It should also be noted that both national studies and local experience has shown that rental units have a higher prevalence of lead-based paint hazards when compared to owner-occupied units (30% and 23%, respectively). Our HOME Investment Partnership will address this by rehabilitating older properties and creating affordable rental and for-sale units that are safe for occupancy and free of lead paint hazards for low- moderate-income households. We plan to rehabilitate at least 10 units of affordable housing that will address help reduce the lead-based paint hazards. The Kent County Housing Commission will also work to eliminate the lead-based paint hazard through adherence to the Housing Quality Standards inspections of all of the Section 8 HCV program properties. Two staff members have been certified as visual lead assessors. They perform HQS inspections of 100% of the HCV units thereby eliminating the lead-paint hazard among our low and very low-income clients.

HOUSING

Specific Housing Objectives

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

(Definitions: “**Large Related:** A household of 5 or more persons, which includes at least one person, related to the householder by blood, marriage or adoption. **Small Related:** A household of 2 to 4 persons, which includes at least one person, related to the householder by birth, marriage, or adoption.”)

Priority 1: Very Low-Income Elderly, Small Related, Large Related, and All Other Renter Households (0-30% Median Family Income).

Analysis: As described in the section on Housing Needs, there is a strong need for assistance within the Extremely Low-Income Renter population. That need stems from a 87.5% incidence rate of housing problems within this income category, of which nearly half are renters.

Strategy Development Activities: In order to alleviate this need, Kent County will continue its Section 8 rental voucher program including applying for additional vouchers that may become available in Kent County and its Shelter Plus Care program, both of which are aimed at this extremely-low income renter population.

Programs: Kent County operates three programs aimed at this priority need group. The first is the Section 8 Housing Choice Voucher program. This program has a goal of addressing the housing needs of 35 Elderly households, 179 Small Related households, 67 Large Related households, and 37 All Other households. The second program is the Shelter Plus Care program. The goal of this program is to address the needs of 57 Small Related households, 5 Large Related households, and 110 All Other households.

Priority 2: Very Low-Income Small Related and Large Related Owner Households (0-30% Median Family Income).

Analysis: As can be seen from the Housing Needs Table, there is a very high rate of severe cost burden among this population group, with Small Related owners showing a rate of 64.4% and Large Related Owners showing a rate of 76.8%. This displays an acute need for assistance which Kent County recognizes.

Strategy Development Activities: In order to alleviate this need, Kent County will be supporting several programs. Kent County will continue its CDBG Rehabilitation Loan and Home Repair Services programs. Additionally, HOME programs will be initiated during the first year of the plan in order to more fully meet the needs of this population group.

Programs: Kent County operates several existing programs and is undertaking new program areas to serve this priority need group. The Kent County CDBG Rehabilitation Loan program serves the needs of 2 Small Related and 2 Large Related households in this priority need group. Additionally, the Home Repair Services program reaches 41 Small Related and 16 Large Related households. Several new programs will be increasing the assistance to this population. First is the HOME Infill and rental rehab Program which will reach 2 Small Related and 2 Large Related households.

Priority 3: Extremely Low-Income Elderly and All Other Owner Households (0-30% Median Family Income).

Analysis: Once again, it can be seen from the Housing Needs Table that this population group suffers from acute housing cost burden. Rates of severe cost burden are 40.8% and 71.9% for Elderly and All Other owner households, respectively, in this income group.

Strategy Development Activities: In order to meet the needs of this priority group, Kent County will be supporting several programs. Kent County will continue its CDBG Rehabilitation Loan and Home Repair Services programs.

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Programs: Kent County operates several existing programs areas to serve this priority need group. The Kent County CDBG Rehabilitation Loan program serves the needs of 2 Elderly households in this priority need group. Additionally, the Home Repair Services program reaches 42 Elderly and 17 All Other households.

Priority 4: Low-Income Elderly, Small Related, and Large Related Owner Households (30-50% Median Family Income).

Analysis: These households are not in as desperate of circumstances as the very low-income group, but their needs are still great. There are 2,216 households within this priority need group who struggle with a housing cost burden. Thus Kent County has undertaken several programs to assist this group.

Strategy Development Activities: In order to alleviate this need, Kent County will be supporting several programs. Kent County will continue its CDBG Rehabilitation Loan and Home Repair Services programs.

Programs: Kent County operates several existing program areas to serve this priority need group. The Kent County CDBG Rehabilitation Loan program serves the needs of 2 Elderly, 2 Small Related, and 1 Large Related households in this priority need group. Additionally, the Home Repair Services program reaches 46 Elderly, 42 Small Related, and 16 Large Related households.

Priority 5: Low-Income All Other Owner Households (30-50% Median Family Income).

Analysis: Within this category, as can be seen from the Housing Needs Table, we find that nearly **73.7%** of the All Other Households in the Kent County CDBG Program Participating Communities suffers from a housing cost burden of some kind. This has led the county to undertake programs of assistance for this group.

Strategy Development Activities: Kent County will continue to fund its Home Repair Services program, which seeks to meet the needs of this priority group.

Programs: Kent County funds the Home Repair Services program which will provide services to 18 All Other households.

Priority 6: Moderate-Income Large Related Owner Households (50-80% MFI).

Analysis: There are still needs to be addressed by households who are at the moderate income level. Among large related households there is still a greater than 65% rate of housing cost burden, which Kent County attempts to alleviate through its programs.

Strategy Development Activities: Kent County will continue to fund its CDBG Rehabilitation Loan program. Additionally, a new HOME program will be initiated to help meet the needs of this priority group.

Programs: The Kent County CDBG Rehabilitation Loan program will serve the needs of 2 Large Related households.

Priority 7: Homeless (The Kent County housing priority for the homeless will be discussed in a later section of this report dedicated to the subject.)

Priority 8: Non-Homeless Special Needs

Strategy Development Activities: Kent County will continue to fund its Section 8 and Shelter Plus Care programs to meet the needs of the members of the community with disabilities. Additionally, the Kent County Community Development Department funding will be continued through other non profit agencies that provide information and services for the disabled community, including accessibility modifications on homes.

Programs: The Section 8 Housing Choice Voucher program assists 83 households with disabled members who are in the very low income category every year. Additionally, the Shelter Plus Care program provides services for 112 persons with serious mental illness, 8 persons with chronic substance abuse problems, 11 persons with both serious mental illness and chronic substance abuse problems, and 20 persons with HIV/AIDS (these numbers are included with the Shelter Plus Care numbers for the specific household type and income level above).

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Disability Advocates of Kent County (DAKC) provides several services for the members of the community with disabilities. The DAKC provides at least 2 community outreach programs. Additional services include assisting persons with disabilities with finding appropriate housing and providing assistance, referral services, and information to individuals and groups. In conjunction with Home Repair Services, DAKC provides 16 property inspections annually, which leads to 10 accessibility modifications provided by Home Repair Services.

Needs of Public Housing Strategy Response:

The only public housing in Kent County outside the cities of Grand Rapids and Wyoming is Rogue Valley Towers, operated by the Rockford Housing Commission. This 52-unit senior/disabled mid-rise tower has been well-maintained, but routine renovations are needed and planned through the HUD Capital Fund Program (CFP). No management changes are anticipated to occur during the 2011-2013 program year.

The 52-unit Rogue Valley Towers operated by the Rockford Housing Commission and occupied by senior/disabled residents, has a Resident Council that reviews all management operations and proposals. It has not been a goal of the Rockford Housing Commission to promote resident participation in homeownership programs.

Barriers to Affordable Housing Response:

In order to combat the barriers families and individuals face when seeking access to affordable housing, Kent County will continue to fund the Fair Housing Center. The Fair Housing Center will conduct testing for discrimination in housing practices and assist in training community members in Fair Housing Practices and their rights.

In addition, utilizing our HOME Investment partnership program funds, we will work with our non-profit development partners to acquire and rehabilitate foreclosed housing for rental or re-sale. By providing development subsidies in more of the communities outside of the traditional hyper-segregated urban core, and inner rings of the suburban sprawl, we will be able to promote the decentralization of poverty, and create more economically integrated communities. Affordable housing will then be available to residents in place, in the entirety of Kent County.

In 2011, the County of Kent published an Analysis of Impediments (AI). Through the Consulting Firm of McKenna Associates, Inc., The County of Kent Department of Housing and Community Development conducted extensive research in preparation for the A.I. The compilation and analysis of the results of this research were the foundation for the A.I. document.

Additionally, the Five-Year Consolidated Strategy and Plan identified a number of general areas of activities wherein Kent County could assess the negative effects of public policies, rules, and regulations on the availability of affordable housing.

Analysis of Impediments to Fair Housing in Kent County: This report identified impediments to fair housing within Kent County. Kent County will continue to review the information and initiate actions recommended as being necessary to remove fair housing barriers.

Kent County will also continue to support fair housing efforts, particularly through its relationship with The Fair Housing Center of West Michigan (FHCWM). Kent County will continue to contract with the FHCWM to perform educational and testing programs throughout the Kent County CDBG Program Participating Communities.

Kent County also participates in the Affordable Housing Committee of the Home and Building Association of Greater Grand Rapids: This committee meets quarterly, and is interested in addressing regulatory policies that pose barriers to affordable housing. During the 2013-2014 program year, Kent County will continue to participate as a member of this committee, with a view toward providing a communications channel to be used to suggest the implementation of recommendations made by this committee, where appropriate.

Citizens League of Greater Grand Rapids Affordable Housing Task Force - "A Dream Deferred" (February, 1992): The Citizens League report identified a number of recommended actions for local governments. The only recommendation addressed directly toward Kent County was to create and establish a Kent County Housing Commission. As previously indicated herein, the Kent County Board of Commissioners has created the Kent County Housing Commission, pursuant to Act 18 of the Michigan Public Acts of 1933, as amended. To date the Kent County Housing Commission has been awarded 390 Housing Choice (Section 8) Vouchers which include Family Unification Vouchers, VASH Vouchers (Veteran) and also has been awarded HUD Family Self-sufficiency Program grants for several years and in 2006 was granted the designation of Homeownership Program. These coordinated programs are focused on removing barriers to affordable housing.

HOME Action Plan Response:

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The HOME Investment Partnerships Program or HOME Program was created by the National Affordable Housing Act of 1990. The purpose of the HOME Program is to increase the supply of affordable housing for low and very-low-income households. The program was designed to reinforce several important values and principles of community development:

- Provide decent, quality, affordable housing to lower-income households,
- Expand the capacity of nonprofit housing providers,
- Strengthen the ability of state and local governments to provide housing, and
- Leverage private-sector participation.

As a Participating Jurisdiction, Kent County is the recipient of development formula grant programs administered by the U.S. Department of Housing and Urban Development (HUD). Kent County is the lead partner in the Kent County HOME Consortium which included the City of Wyoming. The Consortium will accept its HUD HOME Investment Partnerships (HOME) Program 2013-2014 entitlement funds in the amount of \$674,111. The grant funds are allocated based on the following formula provided by HUD.

▪ Kent County (@73.04%)	\$443,133.61
▪ City of Wyoming (@26.96%)	\$163,566.29
▪ Administration (@10%)	\$ 67,411.10

Toward this end, the County of Kent has budgeted HOME funds for various affordable housing projects; and, has identified sources of HOME project matching contributions (cash and non-cash).

Proposed Uses

The Consortium's HOME funds will be allocated to develop affordable rental and for-sale housing units in the amount of \$606,699.90. Kent County has renewed the certification of two developers and granted two additional CHDO Certifications to experienced organizations who demonstrated the requirements. Two certified CHDO developers will substantially rehabilitate units for sale or rent to low-income households. Energy efficiency will be emphasized, and construction and/or rehab of these projects will meet the 15% CHDO set aside requirement.

Program Match

The HOME program requires a 25% non-federal cash or non-cash match(in-kind) contribution by the Participating Jurisdiction. Because Kent County Community Development Department does not receive any non-federal funds for the operation of its programs match is contributed directly to the individual units of housing as they are developed. Developers attribute in-kind contributions, PILOT, FHLB Loans, volunteer labor and donated funds, goods and/or services for HOME eligible projects located in our service area to Kent County to use to meet the match obligation.

Program Administration

The HOME program will be administered by the Community Development Department. All non-profit organizations participating in the HOME program will be contracted with as developers. The Community Development Department works closely with the Fiscal Services Department to assist with the financial management of the program with responsibilities for processing invoices and payments, entering draws in IDIS and applying reimbursements to the County accounts. In addition, the County Legal Department assists with the preparation, processing and approval of developer contracts. They work to gain the approval of the commission and review documents for consistency with HUD regulations. Overall, the administration of Community Development is a shared responsibility with assistance throughout the County structure.

General Requirements

The HOME Investment Partnerships Program (HOME) permits the use of funds to assist Kent County and housing developers to acquire property and rehabilitate/build homes for rental or sale to income-eligible households at or below 80% ami. Funds may also be used to assist homebuyers by reducing the sales price below the appraised value and/or by providing downpayment and closing cost assistance. A homebuyer project may include both a development subsidy and homebuyer assistance, or homebuyer assistance only.

Principal Residence/Period of Affordability

The HOME program requires that a property assisted under a homeownership program be used as the owner's principal residence for a designated time period known as the period of affordability. For rental units assisted with HOME funds, the program requires the assisted property to remain affordable for future tenants for a designated period of time.

The period of affordability is based on the amount of HOME assistance that enabled the homebuyer to purchase the house, regardless of source (i.e. Kent County, MSHDA) or for the amount of the development subsidy in the case of rental units. The applicable periods of affordability are as follows:

Amount of HOME Assistance	Minimum Period of Affordability
<\$15,000	5 Years
\$15,000 - \$40,000	10 Years
>\$40,000	15 Years

Recapture Provisions

The HOME program requires that the assisted property be subject to resale restrictions or recapture provisions, as cited in 92.254(a)(5), for the period of affordability. Kent County will use the recapture option which would secure the amount of HOME funds that remain in the project (i.e. homebuyer assistance) by a silent second mortgage and promissory note. The amount of recapture is forgiven on a monthly pro-rated basis over the length of the affordability period.

If the ownership of the housing is conveyed pursuant to a foreclosure sale as provided in Section 92.254(a)(5)(i)(A) of the HOME Rule, the owner shall have a recapture obligation, in accordance with §92.254(a)(5)(ii)(A), based upon the amount of net proceeds (if any) from the foreclosure sale. The amount of the repayment obligation, as provided in the recapture agreement, shall be prorated based upon the time the homebuyer has owned and occupied the housing measured against the affordability period. If there are no net proceeds from the foreclosure, repayment is not required, and HOME requirements are considered to be satisfied.

For rental housing, the affordability period is secured by a Retention Agreement for Restriction of Use and Occupancy that is recorded as a restrictive covenant on the property. The Retention Agreement specifies that the owner of the rental property must follow the HOME affordability guidelines for the designated period of time and specifies the reporting requirements required by the HOME program.

Development and Homebuyer Subsidies

Housing developers who are undertaking acquisition and/or rehabilitation/construction activities under a homeownership program may be assisted with HOME funds for a development subsidy and for homebuyer assistance. For units developed for rental, the County and the Developer will enter into a contract delineating the terms of development with total funds utilized secured by a promissory note for the period of affordability. For units developed for-sale, once the homebuyer closes on the property, the second mortgage and promissory note will be recorded thereby protecting the HOME development and homebuyer subsidies:

- 1) development subsidy (forgiven by Kent County)
- 2) homebuyer assistance (covered under a new silent second mortgage and promissory note from the homebuyer to Kent County), and
- 3) repayment to Kent County's HOME Program.

Homebuyer assistance may be in the form of a reduced sale price, down-payment/closing cost assistance, or other eligible forms of assistance, however it must exceed \$1,000.00. The homebuyer assistance would be secured by a silent second mortgage and promissory note from the homebuyer to Kent County for the applicable period of affordability. The recapture provisions will apply if the assisted homebuyer sells the home or otherwise does not continue to occupy the home as their principal place of residence during the applicable period of affordability.

Kent County Programs

Kent County may use HOME funds for the acquisition and/or rehabilitation/construction of properties for resale to homebuyers and for acquisition and rehabilitation of property for creation of affordable rental units. The provisions for the affordability period and recapture will apply to the Kent County HOME projects.

Accordingly, if the assisted homebuyer sells the home during the applicable period of affordability, Kent County shall recover the HOME homebuyer assistance from the net proceeds of sale, as specified in 92.254(a)(5)(ii). The amount of funds to be recaptured is based on the following: First, the HOME amount covered under the mortgage and promissory note will be reduced pro-rata based on each complete month the homebuyer has owned and occupied the house, based on the following schedule:

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Affordability Period	Pro-Rated Amount
5 Years	1/60 per month
10 Years	1/120 per month
15 Years	1/180 per month

Secondly, the downpayment, principal payments, and cost of capital improvements made by the homebuyer since purchase would be calculated. If the sum of these investments, plus the prorated amount due Kent County, exceeds the net proceeds of sale, the homebuyer would be allowed to recover his or her investment in the property first, with the remainder being paid back to Kent County. Such an amount would be considered payment in full. The homebuyer would be allowed to keep any net proceeds left after recovery of their investment and repayment of HOME assistance to Kent County.

In those cases where a homebuyer violates the terms and conditions of the second mortgage and/or promissory note, (e.g., sells the property on a Land Contract without the approval of Kent County or uses the property for rental purposes), Kent County reserves the right to require the full repayment of the pro-rated amount of HOME assistance. As specified above, all rental units funded with HOME funds through Kent County have their affordability retained through the use of a recorded Use and Occupancy Restriction specific to the rental unit property.

The Community Development Department conducts outreach on an annual basis to minority- and women-owned businesses to advertise contracting opportunities created by the HOME and CDBG program activities in professional and construction-related trades. The outreach is conducted in publications whose target audience includes Hispanic and minority households in order to reach a broad demographic.

In addition, documents are translated or translators provided when communication is a barrier for program participants or individuals seeking services.

HOMELESS

Specific Homeless Prevention Elements

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

Action Plan Special Needs Response:

The Kent County Community Development Department participates in the community planning process for homeless shelter and services, known as the Essential Needs Task Force (ENTF). Via the ENTf oversight body and the Community Development Department, the County works with the Continuum of Care as they endeavor to implement the Vision to End Homelessness, the CoC's 10 year plan to end homelessness. The CoC coordinates the submission of all MSHDA and HUD applications for Emergency Solutions Grants (ESG), and Supportive Housing Program Grants (SHP) for Kent County. In addition the CoC determines unmet needs, develops strategies, and recommends goals and activities for the coming year while providing guidance on funding priorities for federal, state, and City homelessness resources. Kent County provides \$10,000.00 in administrative funding to support the position of the Continuum of Care Coordinator. This position coordinates the CoC's submissions and Annual Reports, data sharing through HMIS, oversees outreach and implementation of strategic planning activities.

The Annual Action Plan covers the activities supported by the Emergency Solutions Grants (ESG) Program, a federal entitlement program directed to cities and states. For FY 2013-2014, the City of Grand Rapids was allocated a Federal Emergency Shelter Grant in the amount of \$319,037.00. MSHDA designated \$326,912 of its total FY 2013-2014 allocation for Kent County. Distribution of these funds is handled through the CoC application and decision making process.

Homelessness Prevention

The prevention of homelessness has been identified as the "most effective community response to homelessness" in the Housing Continuum of Care. Kent County will support applications from homeless prevention service, emergency shelter, transitional housing, and permanent supportive housing providers for state and federal homeless funds, as consistent with the local Continuum of Care's ten year plan, the "Vision to End Homelessness".

In addition we will continue to work as partners on the ENTf, and participate in the Strategic Planning Body of the CoC to further advance the efficient application, distribution and implementation of resources allocated to service providers throughout the County. The Continuum of Care will receive FY 2013-2014 Emergency Solutions Grant (ESG), Supportive Housing Program (SHP), and CDBG funding from both Kent County and the City of Grand Rapids.

Although the emergency shelter programs are centered in the City of Grand Rapids, they serve families and individuals throughout Kent County. Families in transition or experiencing homelessness may seek assistance funded by MSHDA and HUD through the City of Grand Rapids and MSHDA. Kent County supports the Housing Assistance Program and the centralized intake process. During FY 2013-2014 Emergency Shelter Grant funds will be utilized to support the following emergency shelters and case management services. Kent County and Grand Rapids CDBG funds will be used to support additional services.

Grand Rapids and MSHDA FY 2014 Emergency Shelter Grants funds will be utilized to support the following transitional shelter operation and/or case management services.

HOMELESS PREVENTION PROGRAMS

<u>Agency</u>	<u>Program Activities</u>	<u>Funding</u>	<u>Amount</u>
The Salvation Army Booth Family Services	Housing Assessment Program	MSHDA ESG	\$ 60,000
The Salvation Army Booth Family Services	Financial Assistance Fund	MSHDA ESG	\$183,425
The Salvation Army Booth Family Services	HMIS	GR ESG	\$ 20,000
The Salvation Army Booth Family Services	Administration	MSHDA ESG	\$ 8,928
The Salvation Army Booth Family Services	Coalition to End Homelessness	GR CDBG	\$ 30,000
The Salvation Army Booth Family Services		KCCD	\$ 10,000
Home Repair Services	Foreclosure Intervention	GR CDBG	\$ 17,220
		KCCD	\$ 5,805
Legal Aid of West Michigan	Housing Assistance Center	GR CDBG	\$ 78,207
Fair Housing Center of West Michigan	Fair Housing Assistance	GR CDBG	\$ 65,623
		KCCD	\$ 40,000
Total			\$519,208

EMERGENCY SHELTER PROGRAMS

<u>Agency</u>	<u>Shelter</u>	<u>Funding</u>	<u>Amount</u>
Inner City Christian Federation	Family Haven	MSHDA ESG	\$ 18,702
The Salvation Army-Booth YWCA	Housing Assessment Domestic Crisis Center	GR ESG \$ 85,000 MSHDA ESG	\$ 49,677
Total			\$153,379

TRANSITIONAL SHELTER PROGRAMS

<u>Agency</u>	<u>Housing Facility</u>	<u>Funding</u>	<u>Amount</u>
Dwelling Place of Grand Rapids	Liz's House	GR ESG	\$ 12,982
Grand Rapids Housing Commission	Hope Community	MSHDA ESG	\$ 54,378
Total			\$ 67,360

PERMANENT HOUSING PROGRAMS

<u>Agency</u>	<u>Program</u>	<u>Funding</u>	<u>Amount</u>
The Salvation Army Booth Family Services YWCA	Teen Parent Center	HUD SHP	\$249,854
Community Rebuilders	Project HEAL	HUD SHP	\$391,898
Grand Rapids Housing Commission	Families in Transition (FIT)	HUD SHP	\$607,695
The Salvation Army Booth Family Services	Hope Community	HUD SHP	\$226,900
	Kindred Program	HUD SHP	\$228,488
Total			\$1,704,926

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

Action Plan Community Development Response:

Non-housing community development activities are targeted to the thirty-three (33) participating local jurisdictions within Kent County and located within geographic areas which benefit low and moderate income households. Because of the enormous geographic size of this type of program at the county level, Kent County has adopted the program philosophy of allowing the local jurisdictions to program funds to eligible projects, services, and locations within detailed administrative guidelines. This county-wide programmatic approach is implemented within the HUD CDBG objective of "the development of viable urban communities, by providing decent housing and a suitable living environment, and expanding economic opportunities, principally for persons of low and moderate income." Additionally, the local program choices must fall within three (3) operational objectives of benefiting low and moderate income persons, addressing slums and blight, and/or meeting a particularly urgent community development need.

After meeting the program objectives, the local units of government propose projects which fall within the category of:

1. Public Facilities and Improvements
2. Public Services
3. Removal of Slums and Blight on a Spot Basis

These non-housing community development activities, when combined with the housing programs and homeless assistance effort, demonstrate a commitment by Kent County to target program projects and services to low and moderate income populations within a specific geographic area, on a community-wide basis, or for a special population (abused children, elderly persons, battered spouses, homeless persons, severely disabled adults, illiterate persons, migrant farm workers, and persons with HIV/AIDS).

Antipoverty Strategy Response:

The County's goals, programs and policies for reducing the number of poverty-level families are to support programs that help stretch scarce resources for families and individuals living in poverty. The 2013 Health and Human Services Poverty Guideline for a family of four is \$23,050. For a single person, the level is \$11,170. With the minimum wage at \$7.40 an hour, a single person would be able to earn \$15,392 working full-time. To pay no more than thirty percent of their income toward housing (HUD's definition of affordability) they would need a unit costing \$384 or less per month. In Kent County, the fair market rent for a one bedroom apartment is \$618 (Kent County Housing Commission 2013 Payment Standard) which exceeds what people earning minimum wage can afford, in particular when they do not get full-time hours. With the fair market rent of a two bedroom apartment at \$744, a one-wage earner household would have to earn an annual wage of \$30,000 or \$15 an hour to afford a market rate apartment.

The County utilizes fifteen percent of its annual CDBG entitlement grant to support services in the community which are designed to increase access to basic services for very low income individuals. These services include transportation for the elderly and persons with disabilities, youth services, meals for seniors both home-delivered and at congregate dining sites, and support for senior centers which provide information and referral to seniors. In addition, housing programs offered by the County through the CDBG, HOME and other HUD-funded programs assist low-income individuals either directly with housing subsidies or through improvements to their living environment. By improving access to services people can gain the tools they need to meet their daily needs and those of their children. Kent County also funds weatherization programs and services which decrease utility bills. This in turn leaves funds available for other living costs.

The Kent County Housing Commission addresses alleviation of poverty through its Family Self Sufficiency (FSS) program. Voucher holders voluntarily participate in the FSS program, in which they work with a caseworker to create a personal plan to save money, increase their education and/or job skills, and in some cases purchase a home.

The primary factor that influences the degree of poverty is the ability of a household or individual to generate household or personal income. Private income generation is not a factor that can be directly controlled by Kent County. However, the County does involve itself in programs that have an impact, albeit indirectly, on household or personal income. These programs, and their impacts, are as follows:

Affordable Housing Activities: Kent County utilizes CDBG, HOME, and other funds to undertake housing rehabilitation activities that benefit extremely low-income families and individuals. These housing rehabilitation activities include energy efficient improvements that tend to reduce utility costs and thus increase disposable household income. This means that

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extremely low-income families and individuals have additional funds to spend on their other needs. In addition, the Kent County Housing Commission is involved in the Housing Choice (Section 8) Voucher Family Self Sufficiency (FSS) and HomeOwnership programs, which are intended to assist families/individuals to obtain a greater degree of self sufficiency and allow extremely low-income families and individuals to obtain better housing at a lower cost, and thus increase the amount of funds available for such families to use in meeting other needs.

Emergency Needs Programs: Kent County residents are eligible to participate in a program, administered by ACSET (Kent and Grand Rapids CAP) and the North Kent Service Center, under which emergency financial payments for shelter, entrance rent, security deposits, rental arrearage, and utility assistance are provided to families and individuals of extremely low income to assist them from becoming homeless. These programs provide strictly limited assistance, to those in the most dire circumstances. The impact tends to provide only short-term relief to those in need, due to funding limitations.

Job Training Partnership Act Activities: Also through ACSET, extremely low-income Kent County residents are screened for and provided employment counseling and training. Such activities are intended to prepare individuals to either enter the job market or increase their skills in order to increase their employment opportunities. The impact of these efforts is intended to provide additional household or personal income, and thus reduce poverty.

Child Care Programs: According to the Kent County Department of Human Services, a total of 692 licensed child care facilities were operating in the Kent County CDBG area in 2013. According to a study of 100 counties in 36 states conducted by researchers at Harvard University, child care tends to be available to children of both affluent and lower-income families, but the child care needs of lower working class and middle class families tend to go unmet. A full spectrum of child care services would tend to promote a reduction in poverty, as it would free up the time needed for single-parents to seek and obtain employment.

In light of the above programs, the anti-poverty strategy of Kent County includes the continued implementation of all activities mentioned above, with additional coordination and some possible limited CDBG funding for public service activities.

The County of Kent supports the anti-poverty efforts of the following agencies:

Kent County Department of Human Services (DHS)

Access of West Michigan

Second Harvest Cleaners

Senior Meals Program, Inc

Dwelling Place of Grand Rapids, Inc

Genesis Non-Profit Housing Corporation

Hope Network

Home Repair Services (HRS) of Kent County

Area Community Services Employment Training (ASCET) Council

State Legislation. On December 29, 2004, Governor Granholm signed into law legislation that will help make affordable housing more attainable to residents. The program will make grants and loans encouraging developers to build as many as 1,000 low- and mixed-income rental and homeowner units each year.

The legislation establishes the Affordable Housing Fund to target the state's most critical housing needs and spend as much as \$25 million each year to expand ownership and rental choices for people with limited incomes.

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

Non-homeless Special Needs Response:

Kent County provides, through its Health Department, Community Mental Health Department, and Department of Human Services, a number of programs and activities to serve this population on a county-wide basis. No major changes to the established service-delivery system are envisioned in the 2013-2014 program year, although state and local funding sources continue to be down-sized and the impacts of welfare reform are unclear. Aside from these traditional activities, in 2013-2014, Kent County will attempt to undertake the following:

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In order to provide affordable housing opportunities to this population, Kent County has created the Kent County Housing Commission, pursuant to Act 18 of the Michigan Public Acts of 1933, as amended. It would be anticipated that such an agency will take the steps necessary to increase the supply of standard rental units available to house this population and to subsidize the rental rates in order to make such units affordable by means of Housing Choice (Section 8) Vouchers. Depending upon the availability of funding, it is possible that as many as 25 housing units could be made available under the Section 8 rental assistance program prior to the end of the 2013-2014 program year.

Kent County will continue its contractual relationship with the Fair Housing Center of Greater Grand Rapids (FHC), under which Kent County provides funds to the FHC to affirmatively further and promote fair housing for persons with special needs.

Kent County will initiate research through HUD, MSHDA, and RHS to identify potential sources of funding for new housing construction to meet the identified needs of this population.

Category of Residents

Persons with special needs are typically persons (or households) with a serious health issue which undermines their ability to work and live with independence. Persons with special needs are typically mentally ill, physically handicapped or developmentally disabled. Others, such as frail elderly, substance abusers, and persons with AIDS, may also need supportive housing assistance.

Support to Other Entities

Kent County will support efforts on the part of other entities to apply for funding programs that will result in a variety of affordable rental housing choices for very low income persons with special needs. Individual applications and proposals will be reviewed to insure consistency with the goals and objectives established in the Five-Year Consolidated Strategy and Plan, and to insure consistency with other county and/or local governmental unit goals and objectives for development. Typical programs that Kent County will likely support, that work toward a variety of affordable rental choices for very low income persons with special needs, are the Section 202 program (for the elderly), the Section 811 program (for the physically handicapped and developmentally disabled), projects utilizing Low Income Housing Tax Credits, and an increase in the Housing Choice (Section 8) Voucher program (for all special needs categories).

Leveraging

The programs identified under this priority will not leverage other investments. The only program having a matching requirement is the Shelter Plus Care program, for which Kent County has obtained commitments for the required public service support activities from the appropriate local agencies that will deliver such services.

One-Year Goals

As previously stated, Kent County will continue to apply for additional Housing Choice (Section 8) Vouchers that will provide a variety of affordable housing choices for very low income persons with special needs.

Housing Opportunities for People with AIDS

*Please also refer to the HOPWA Table in the Needs.xls workbook.

Action Plan HOPWA Response:

The HOPWA program activities in Kent County are administered by the Kent County Health Department on behalf of HOPWA Services Providers of West Central Michigan. The funds are dispersed from the Michigan Department of Community Health, Division of Community Living. Kent County will distribute 22 Housing Certificates annually managed by St. Mary's Mercy Medical Center's McAuley Health Center. McAuley will also perform Direct Assistance and Case Management functions for HOPWA recipients in Kent County.

Although Kent County does not administer HOPWA funds directly, our Shelter Plus Care funds provide some housing burden relief and supportive services for individuals living with HIV/Aids, including Community Rebuilders and Dwelling Place.